

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

J.G.,	:	
	:	
Plaintiff,	:	
	:	
vs.	:	
	:	
NORTHBROOK INDUSTRIES, INC., D/B/A UNITED INN AND SUITES,	:	
	:	
Defendant.	:	
	:	

CIVIL ACTION FILE

NO. 1:20-cv-05233-SEG

JOINT MOTION

**JOINT MOTION TO EXTEND THE DEADLINE FOR THE PARTIES
TO FILE THEIR RESPECTIVE RESPONSES IN OPPOSITION TO
THE PENDING MOTIONS *IN LIMINE***

Plaintiff J.G. and Northbrook Industries, Inc. d/b/a United Inn & Suites, (hereafter, “Parties”), hereby jointly move to extend the deadline for the Parties to file their respective responses in opposition to the pending motions *in limine* (Docs. 160, 161) up and through March 14, 2025. In support, the Parties state the following:

1.

On February 26, 2025, Plaintiff and Defendant filed their respective Consolidated Motions *in Limine* and Memoranda of Law in Support in the instant case. (Docs. 160, 161).

2.

The current deadline for the Parties to file responses to the same motions is March 12, 2025. (Doc. 145).

3.

The Parties request a two-day extension of time to prepare and file their respective responses in opposition to the foregoing motions *in limine* because of the press of other matters and deadlines. Granting the requested two-day extension will provide the Parties with adequate time to prepare their respective response briefs.

4.

Counsel for the Parties have discussed the proposed extension and agree that it is reasonable and necessary and have further agreed to join in this motion.

5.

This is the first extension the Parties have requested to prepare and file responses to the pending motions *in limine*, and, therefore, the Parties respectfully request that the Court grant the instant joint motion. The text of a proposed Consent Order is attached hereto as “Exhibit A”.

WHEREFORE, the Parties respectfully request that this Court grant their Joint Motion to Extend the Deadline for Parties to File Responses in Opposition to the Respective Motions *in Limine* for the reasons set forth above.

Respectfully submitted this 10th day of March, 2025.

/s/ David H. Bouchard
David H. Bouchard
david@finchmccranie.com
Georgia Bar No. 712859
Richard W. Hendrix
rhendrix@finchmccranie.com
Georgia Bar No. 346750
Oto U. Ekpo
oto@finchmccranie.com
Georgia Bar No. 327088
Gabriel E. Knisely
gabe@finchmccranie.com
Georgia Bar No. 367407

FINCH McCRANIE, LLP
229 Peachtree Street, NE
Suite 2500
Atlanta, Georgia 30303
(404) 658-9070 – Telephone
(404) 688-0649 – Facsimile

/s/ Patrick J. McDonough
Jonathan S. Tonge
jtonge@atclawfirm.com
Georgia Bar No. 303999
Patrick J. McDonough
pmcdonough@atclawfirm.com
Georgia Bar No. 489855

ANDERSEN, TATE & CARR, P.C.
One Sugarloaf Centre
1960 Satellite Boulevard, Suite 4000
Duluth, Georgia 30097
(770) 822-0900 – Telephone
(770) 822-9680 – Facsimile

Attorneys for Plaintiff

/s/ Dana M. Richens
Dana M. Richens
drichens@sgrlaw.com
Georgia Bar No. 604429

SMITH, GAMBRELL & RUSSELL, LLP
1105 W. Peachtree NE, Suite 1000
Atlanta, Georgia 30309
(404) 815-3659 - Telephone
(404) 685-6959 - Facsimile

*Attorney for Defendant
Northbrook Industries, Inc.,
d/b/a United Inn and Suites*

CERTIFICATE OF COMPLIANCE

This is to certify that the foregoing **Joint Motion to Extend the Deadline to File Responses in Opposition to the Respective Motions *in Limine*** has been prepared with a font and point selection approved by the Court in LR 5.1., NDGA. Specifically, the above-mentioned pleading was prepared using Times New Roman font of 14-point size.

Respectfully submitted,

/s/ David H. Bouchard
David H. Bouchard
david@finchmccranie.com
Georgia Bar No. 712859

FINCH McCRANIE, LLP
229 Peachtree Street, NE
Suite 2500
Atlanta, Georgia 30303
(404) 658-9070 – Telephone
(404) 688-0649 – Facsimile

Attorney for Plaintiff

CERTIFICATE OF SERVICE

The undersigned hereby certify that Plaintiff, through her attorneys, has served a true and correct copy of the foregoing Motion into this District's ECF System, which will automatically forward a copy to counsel of record in this matter.

Dated: This 10th day of March, 2025.

/s/ David H. Bouchard
David H. Bouchard
david@finchmccranie.com
Georgia Bar No. 712859
Richard W. Hendrix
rhendrix@finchmccranie.com
Georgia Bar No. 346750
Oto U. Ekpo
oto@finchmccranie.com
Georgia Bar No. 327088
Gabriel E. Knisely
gabe@finchmccranie.com
Georgia Bar No. 367407

FINCH McCRANIE, LLP
229 Peachtree Street, NE
Suite 2500
Atlanta, Georgia 30303
(404) 658-9070 – Telephone
(404) 688-0649 – Facsimile

Attorneys for Plaintiff